Commonwealth of Kentucky Division for Air Quality

PERMIT STATEMENT OF BASIS

DRAFT PERMIT No. F-01-043
Willamette Industries, Inc.- Richwood Preprint Plant
380 Shorland Drive, Richwood, Kentucky 41094

DECEMBER 15, 2001 FROUGH SHERWANI, REVIEWER PLANT I.D. # 021-015-00106 APPLICATION LOG # 54077

SOURCE DESCRIPTION:

The Willamette Industries, Inc. operates a flexographic printing facility in Richwood Kentucky. The facility uses water-based ink and varnishes on company- supplied linerboard.

The facility was classified as 401 KAR 50:031 source. The facility has permit # C-92-136 (Revised).

The facility has applied a source-wide application.

The facility has a flexographic press, three dryers, one varnish applicator and one plating operation unit.

Emission Point 01 Flexographic Printing

MP1 Ink Applicator

This point is for ink applicator. The "PTE" is based on 12.5 lbs. per hour. The "PTE" is based on 6500 hrs per year.

MP2 Ink Applicator

This point is for ink applicator. The "PTE" is based on 12.5 lbs. per hour. The "PTE" is based on 6500 hrs per year.

MP3 Ink Applicator

This point is for ink applicator. The "PTE" is based on 12.5 lbs. per hour. The "PTE" is based on 6500 hrs per year.

MP4 Ink Applicator

This point is for ink applicator. The "PTE" is based on 12.5 lbs. per hour. The "PTE" is based on 6500 hrs per year.

MP5 Ink Applicator

This point is for ink applicator. The "PTE" is based on 12.5 lbs. per hour. The "PTE" is based on 6500 hrs per year.

MP6 Ink Applicator

This point is for ink applicator. The "PTE" is based on 12.5 lbs. per hour. The "PTE" is based on 6500 hrs per year.

MP7 pH Adjuster

This point is for adjusting pH for the solution. The "PTE" is based on 0.25 gallons per hour. The "PTE" is based on 6500 hrs per year.

MP8 Propylene Glycol

This point is for propylene Glycol. The "PTE" is based on 0.5 gallons per hour. The "PTE" is based on 6500 hrs per year.

MP9 Clean-Up

This point is for clean-up. The "PTE" is based on 0.5 gallons per hour. The "PTE" is based on 6500 hrs per year.

MP10 Main Dryer

This point is for drying oven. Natural gas is used as fuel. The rated capacity of the oven is 1.0mmBTU per hr. The "PTE" is based on 6500 hrs per year.

Emission Point 02 In- Between Dyer

This point is for drying oven. Natural gas is used as fuel. The rated capacity of the oven is 1.0mmBTU per hr. The "PTE" is based on 6500 hrs per year.

Emission Point 03 Varnish Operation

MP1 Varnish Applicator

This point is for varnish applicator. The consumption of varnish is 57 lbs. per hour. The "PTE" is based on 8760 hrs per year.

MP2 Varnish Dryer

This point is for varnish dryer. Natural gas is used as fuel. The rated capacity of the oven is 1.5 mmBTU per hr each.

Emission Point 04 Plating operations

This point is for Plating operations, which includes plate exposure unit, plate wash out unit, plate dryer unit, floor sweep, and distillation unit. The consumption of solvent is 2.0 gallons per hour. The "PTE" is based on 8760 hrs per year.

COMMENTS:

There is no control for the any of pollutants.

Emission factors and their source:

AP -42 5th edition, and mass balance are used for the emission factors for PM, VOC and HAPS.

Applicable regulation:

State regulation 401 KAR 59:010, New process operations, applies to this source because these are process operations that were commenced after July 2, 1975.

State regulation 401 KAR 52:030 Federally-enforceable permits for non-major sources.

State regulation 401 KAR 59:212 New graphic arts facilities using rotogravure and flexographic.

EMISSION AND OPERATING CAPS DESCRIPTION:

The actual VOC emissions shall not exceed 50.0 tons per year. These annual limitations shall not be exceeded during any consecutive twelve months period for the entire source.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.